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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

KEVIN BRATCHER,
Plaintiff,

v.

POLK COUNTY, CITY OF SALEM, DEPUTY
MICHAEL H. SMITH, in his individual
capacity, and DOES 1-2, in their individual
capacity,
Defendants.

Case No. 3:20-CV-02056-SB

**SUPPLEMENTAL DECLARATION OF
OFC. CHAD GALUSHA IN SUPPORT
OF CITY DEFENDANTS' REPLY TO
PLAINTIFF'S RESPONSE TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

I, Chad Galusha, hereby declare under penalty of perjury that the following is true and correct:

1. I am a law enforcement officer employed by the City of Salem Police Department. I make this declaration based on personal knowledge and am competent to testify to the matters stated herein.

2. I do not recall either myself or Sergeant Donner tossing or throwing plaintiff's cell phone or stimulator control device during the course of our contact with him on September 6, 2019.

3. At no point during my contact with plaintiff, did I intend to place him in imminent apprehension of harmful or offensive conduct.

I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED: April 18, 2022.

s/ Chad Galusha

Officer Chad Galusha